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May 23, 2002

**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: Performance Measurements and Standards for Interstate Special Access Services,  
CC Docket No. 01-321

Dear Ms. Dortch:

Yesterday, G. Holland, J. Bosley, S. Ingram and I represented Verizon in a meeting with J. Stanley, M. Stone, U. Onyeija, R. Crittendon, B. Childers, P. Megna, J. Kraushaar, B. Ghaffari, C. Zima, D. Shiman and J. Stanshine of the Wireline Competition and Enforcement Bureaus to discuss the above matter. The materials used during this meeting are enclosed. The key message points discussed are also presented in the attached document.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Dee May" followed by a circular stamp containing the letters "AR".

Attachments

cc: J. Stanley  
M. Stone  
U. Onyeija  
R. Crittendon  
B. Childers  
P. Megna  
J. Kraushaar  
B. Ghaffari  
C. Zima  
J. Stanshine

# *Special Access Performance Measures*

## *NPRM*

VERIZON

May 22, 2002

## *Performance Measures are not Required*

- Special Access market is thriving and competitive
- The competitive market provides the necessary incentives for timely performance and quality assurance
- Sufficient mechanisms already exist to address performance issues

## *Performance Measures Proposed by JCIG*

- Others have proposed to require Verizon to report nearly 10,000 measures every month

***If performance reporting is required,  
the only metric that should be reported  
is:***

- On Time Performance

*If performance reporting is required, the following should apply:*

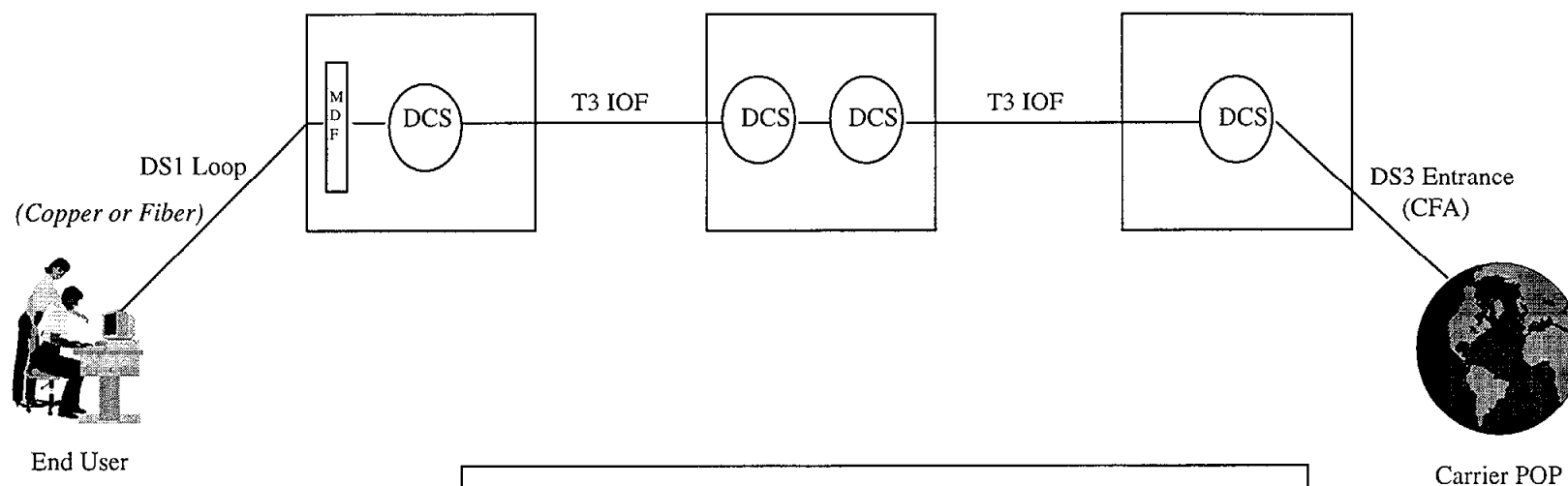
- Reporting should not be required for services declared competitive by the FCC
- Reporting should not be required for services offered under contract
- Reporting should not occur more frequently than semi-annually
- Reporting should sunset after 2 years

***If performance reporting is required,  
then all providers should be subject to  
the same requirements***

- Any reporting requirements should be imposed on all service providers, not just Verizon and other ILECs



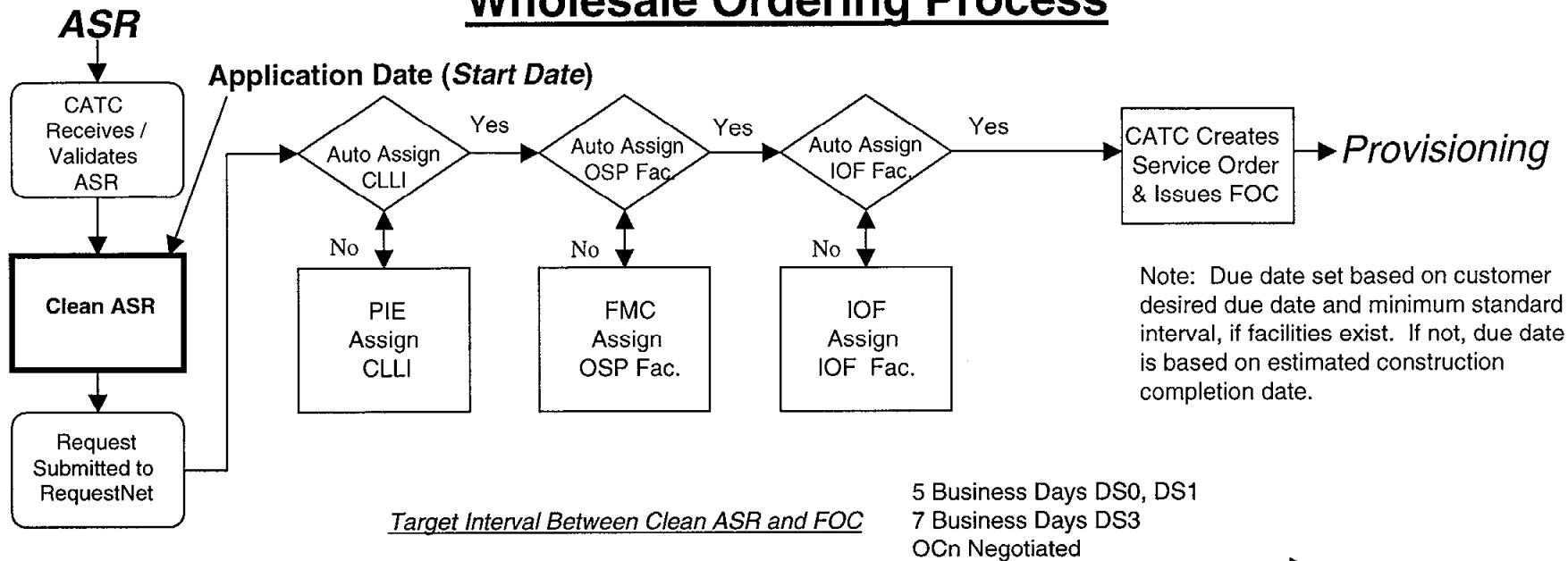
## DS1 Point-to-Point Special Access Circuit



MDF – Main Distribution Frame  
DCS – Digital Cross-connect System  
IOF – Inter-Office Facility  
CFA – Connecting Facility Assignment  
POP – Point Of Presence

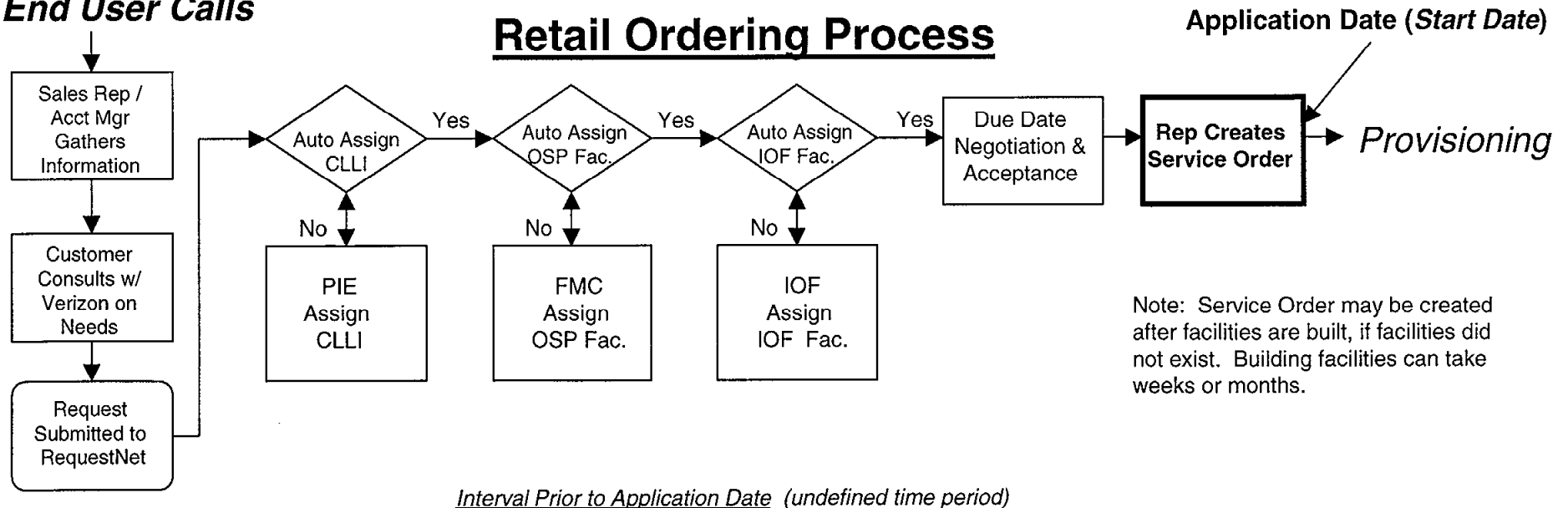


## Wholesale Ordering Process



### End User Calls

## Retail Ordering Process



## Wholesale Provisioning Process

### *Ordering*

CATC Creates  
Service Order  
& Issues FOC

Build Facilities  
If Required  
(can take  
weeks or  
months)

Provisioning  
Center  
Designs  
Circuit(s)

Connect  
Circuit Path  
In Central  
Office(s)

CATC Tests  
Continuity  
Between  
Central  
Office(s)

Connect  
Circuit(s) at  
End User  
Location(s)

CATC Tests  
End-to-End  
Circuit with  
Carrier  
Customer

Circuit  
Complete

### *Provisioning*

### *Ordering*

## Retail Provisioning Process

Rep Creates  
Service Order

Application Date (Start Date)

Build Facilities  
If Required  
(can take  
weeks or  
months)

Provisioning  
Center  
Designs  
Circuit(s)

Connect  
Circuit Path  
In Central  
Office(s)

OCO Tests  
Continuity  
Between  
Central  
Office(s)

Connect  
Circuit(s) at  
End User  
Location(s)

OCO  
Tests  
End-to-End  
Circuit

Circuit  
Complete

### *Provisioning*

## Wholesale Provisioning Process

### *Ordering*

CATC Creates  
Service Order  
& Issues FOC

Build Facilities  
If Required  
(can take  
weeks or  
months)

Provisioning  
Center  
Designs  
Circuit(s)

Connect  
Circuit Path  
In Central  
Office(s)

CATC Tests  
Continuity  
Between  
Central  
Office(s)

Connect  
Circuit(s) at  
End User  
Location(s)

CATC Tests  
End-to-End  
Circuit with  
Carrier  
Customer

Circuit  
Complete

### *Provisioning*

## Retail Provisioning Process -- Alternative Path

### *Ordering*

Rep Creates  
Service Order

Application Date (*Start Date*)

Build Facilities  
If Required  
(can take  
weeks or  
months)

Provisioning  
Center Designs  
Circuit(s)

Connect  
Circuit Path  
In Central  
Office(s)

OCO Tests  
Continuity  
Between  
Central  
Office(s)

Connect  
Circuit(s) at  
End User  
Location(s)

OCO  
Tests  
End-to-End  
Circuit

Circuit  
Complete

### *Provisioning*

# **Definitions**

**ASR** – Access Service Request as defined by industry standards

**CATC** – Carrier Account Team Center is the center that handles ordering, provisioning and maintenance processing for carrier customers, for both affiliate and non-affiliate carriers.

**CLLI** – Common Language Location Identifier is a network location identification.

**FMC** – Facilities Management Center is responsible for the engineering records for outside plant facilities.

**FOC** - Firm Order Confirmation

**IOF** – Inter-Office Facilities is responsible for the engineering records for Inter-Office facilities.

**OCO** -- Overall Control Office is the center that handles ordering and provisioning processing for end user customers, including ISPs.

**OSP** – Outside Plant Facilities

**PIE** – Power and Infrastructure Engineering is responsible for maintaining CLLI information.

**RequestNet** – System used to check/assign circuit facilities